

UNITED STATES DISTRICT COURT

for the
Western District of Missouri

United States of America

v.

JUAN JONES
(DOB 02/15/1988)

Case No. 16-mj-2003DPR

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 21, 2015, and January 6, 2016 in the county of Greene in the
Western District of Missouri, the defendant(s) violated:*Code Section*

18 USC 2252(a)(4)

Offense Description

Between August 21, 2015, and January 6, 2016, in Greene County, in the Western District of Missouri, the defendant, did knowingly possess any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(4) and (b)(2).

This criminal complaint is based on these facts:

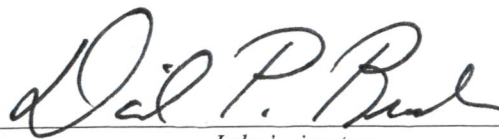
See Attached Affidavit of SMCCTF TFO Brian Martin.

☒ Continued on the attached sheet.*Complainant's signature*

TFO Brian Martin

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/06/2016*Judge's signature*City and state: Springfield, Missouri

David P. Rush, U.S. Magistrate Judge

Printed name and title

COPY

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

I, Brian E. Martin, being first duly sworn, do hereby depose and state that:

1. I have been a police officer over twenty years, and have received specialized training in several areas including computer crimes investigations, child pornography investigations (including training on state and federal laws regarding child exploitation, obscenity, and international sex tourism; training on the National Child Victim Identification Program, used to track the transmission of digital files being circulated through various forms of computer-related media such as Internet websites; and additional training in file-sharing/peer-to-peer network investigations), and child exploitation investigations in general. I have been assigned to the Southwest Missouri Cyber Crimes Task Force (SWMCCCTF) since 2008. I have been cross designated as an agent with enforcement and investigative powers granted to Department of Homeland Security Investigations under Title 18 of the United States Code. I have been involved in over one hundred investigations of the exploitation of children.

2. The statements in this affidavit are based on my personal observations, my training and experience, my investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth the facts that I believe are necessary to establish probable cause in support of a criminal complaint against Juan Jones, for

violation of Title 18, United States Code, Section 2252(a)(4), possession of child pornography.

3. On September 25, 2015, Southwest Missouri Cyber Crimes Task Force Officer (TFO) Brian Martin opened an investigation on CyberTip 6329521. The CyberTip was originally filed with the National Center for Missing and Exploited Children (NCMEC), the national clearinghouse for such reports, by Dropbox, Inc. (hereinafter "Dropbox") on August 21, 2015.

4. Dropbox is a file hosting service and online backup facility, operated by Dropbox, Inc. Dropbox offers cloud storage, file synchronization, and client software. Dropbox stores a user's data on their server using cloud storage. A user can store any kind of file in Dropbox by uploading data to their account via the Dropbox website, the Dropbox desktop application ("app"), or the Dropbox mobile application. Once a user upload files to a Dropbox account, a user may access their files anywhere and can share them with anyone. Any files a user saves to Dropbox will also instantly reflect the same content in any of the user's computers, smart phones, tablets (that have the Dropbox application) and the Dropbox websites. Users receive 2GB of storage space for free; additional space can be purchased.

5. TFO Martin reviewed the CyberTip from NCMEC. According to the CyberTip, Dropbox had discovered many video and image files that they believed contained child pornography. The files were discovered in an account with the username "Juan Jines," with an account ID of 196266196. The email associated with the account is

man_cardinal@yahoo.com. The account was established on July 25, 2013, and it is a free account. Dropbox reported two IP addresses were used to upload the video and image files; IP address 172.56.10.225 was used on December 15, 2014, and IP address 172.56.12.46 was used on April 26, 2015. Both of these IP addresses are registered to T-Mobile. An Investigative Subpoena was sent to T-Mobile to determine the holder of the IP address. T-Mobile advised their IP addresses are not user specific, merely gateways to the Internet.

6. TFO Martin reviewed the thirteen files submitted by Dropbox with the Cybertip. All of the files contained what he believed to be child pornography. A brief description of three files is provided below:

- a. File one is entitled "Buena Fiesta.3gp," and is a video file. The video shows a prepubescent female and a prepubescent male sitting on a couch or bed. There are adult voices heard in the background. Shortly into the film, the two children begin engaging in vaginal and anal intercourse.
- b. File two is entitled "fernanda h 07 by spooky - by tlz(2).avi" and is a video file. The video shows a prepubescent female on a webcam. removing her clothes and simulating sexual intercourse. Her breasts, vagina, and anus are displayed. The child appears to be engaging in a chat session with someone who is telling her what to do.
- c. The third file is entitled "ptxx) 2014_02_tlz_hpim0003.avi," and is a video file. The video shows a prepubescent female lying on her back with her

vagina exposed. She tries to open what appears to be a bottle of baby oil and has to have someone help her open it. After getting the bottle open, she pours some oil on her vagina and puts some on a vibrator. She is also seen putting her fingers inside her vagina.

7. When checking social media websites using the email address man_cardinal@yahoo.com, a MeetMe.com account was located in the name "Jauan Jones." Jones identifies himself as a twenty-seven year old male residing in Ozark, Missouri. Analysis performed by Missouri Internet Crimes Against Children located a person named Juan Jones living in Springfield, and who is employed as a Greene County Deputy Sheriff.

8. On October 23, 2015, TFO Martin obtained a search warrant from the Barry County Circuit Court to obtain the files that Dropbox had sequestered from the Dropbox account associated with man_cardinal@yahoo.com. On November 19, 2015, TFO Martin received a USB storage device containing the files that Dropbox had retained. There are 168 video files and approximately 1,500 image files depicting child pornography. Some of the files depict children as young as infants being sexually abused by adult males. Some of the non-child pornography image files are ones that TFO Martin has seen on social media sites that would tend to indicate the poster is, or was, involved in law enforcement. These image files depict police officers, police vehicles, statements made by police officers, and other items indicative of supporting law enforcement.

9. Dropbox also provided spreadsheets that listed the date and time files were added to the account, deleted from the account, additional folders that were created in the account, and whether the action was taken by the account holder or a guest. The account holder normally uses a Samsung model SM-N900T cell phone to access the account. This style phone accessed the account on May 11, July 7, and July 26, 2015. The phone uses T-Mobile as a carrier. When the account was established, the user used a Samsung SGH-T999 cell phone. Other information provided indicates a computer named "CHILD-OF-GOD-PC" has accessed the account.

10. In addition, the return revealed the most recent IP addresses used to access the account. The IP address was a Verizon IP address. An Investigative Subpoena was sent to Verizon to determine any subscriber information. Verizon advised their IP addresses are not user specific, and the return listed in excess of two hundred people using that IP address to access the Internet during the time frame given: between 03:31:38 and 04:41:13 hours UTC on July 7, 2015.


11. On November 19, 2015, TFO Martin searched the Internet using the email address man_cardinal@yahoo.com. TFO Martin received a response from the website http://publicemailrecords.com/email_search and found the name Juan Jones of Springfield, Missouri associated with that email. No other names were returned.

12. TFO Martin requested information concerning Juan Jones from the Missouri Intelligence Analysis Center (MIAC). Information provided by MIAC listed Juan Jones as employed as a Deputy Sheriff in Greene County, Missouri, as well as by the

Springfield Cardinals. TFO Martin also learned from a Lexis-Nexis Report provided by MIAC that his listed phone is a T-Mobile phone with the number (417) 569-0595. Missouri Driver License files indicate Juan Jones lives at 2685 East Atlantic Street, Springfield, Missouri. The Lexis-Nexis database also indicates he formerly lived in Ozark, Missouri.

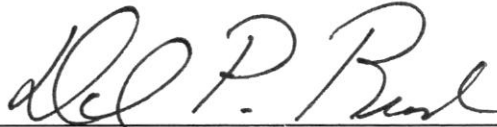
13. On January 6, 2016, members of the SWMCCTF served a federal search warrant for 2685 East Atlantic Street, Springfield, Missouri. While the warrant was being executed, TFO Chip Root and TFO Martin made contact with Juan Jones (hereinafter "Jones") at his place of employment, Greene County Sheriff's Office. TFO Root and TFO Martin met with Jones in an interview room. After being advised of the search warrant, and his *Miranda* rights, Jones agreed to speak with TFO Root and TFO Martin. Jones admitted that he had looked at child pornography for as long as ten years. He identified his email address as man_cardinal@yahoo.com. He admitted to having a Dropbox and Tumblr account, and he admitted that he had stored child pornography within those accounts. Jones stated he had met individuals on the file sharing site Tumblr with whom he exchanged child pornography images. He stated he used his cellular phone, a Samsung SM-N900T, when he looked at the child pornography. Jones admitted he used a Verizon hot spot for Internet connection.

14. Based on the forgoing, Affiant submits there is probable cause in support of a criminal complaint against Juan Jones, for violation of Title 18, United States Code, Section 2252(a)(4), possession of child pornography.



Brian E. Martin, Task Force Officer
Southwest Missouri Cyber Crime Task Force

Subscribed and sworn to before me this th6 day of January, 2016.



HONORABLE DAVID P. RUSH
UNITED STATES MAGISTRATE JUDGE